

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**STATE DEFENDANTS' NOTICE OF FILING RESPONSE TO
COURT'S REQUEST REGARDING TEXAS SYSTEM**

During the teleconference with the Court held earlier this afternoon, the Court also requested State Defendants file the differences in the Texas system analysis and the Georgia system.

In Paragraph 6 of the Declaration of Dr. Eric D. Coomer, filed at [Doc. 658-2], Dr. Coomer explained:

Texas' decision not to certify the Dominion system was primarily based on perceived issues of complexity of configuring the equipment especially for smaller counties. However, Dominion's Democracy Suite solution with the ImageCastX BMD has been successfully used in multiple small counties throughout the country since 2016. Other perceived issues raised in the Texas certification were assertions that

the secrecy of the ballot was not preserved. This is incorrect. All data stored on the ImageCast Precinct tabulators is randomized. There is no uniquely identifying information stored in the audit mark, or on the compact flash memory card for any ballot that is tabulated, whether from the ImageCastX BMD, or from a hand-marked ballot.

Respectfully submitted this 31st day of August, 2020.

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CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing **STATE DEFENDANTS' NOTICE OF FILING RESPONSE TO COURT'S REQUEST REGARDING TEXAS SYSTEM** has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ Bryan P. Tyson
Bryan P. Tyson